REMARKS/ARGUMENTS

The Office Action mailed April 17, 2003 has been received, its contents carefully noted, and the applied citation thoroughly studied. Accordingly, the foregoing revisions to the claims are tendered with the conviction that patentable contrast has now been made manifest over the known prior art. Accordingly, the Examiner is respectfully requested to favorably receive this amendment, entering it into the subject application. Moreover, all rejections tendered by the Examiner in the above-referenced Office Action are hereby respectfully traversed and reconsideration is respectfully requested.

Information Disclosure Statement

The Examiner noted that the Information Disclosure Statement filed on June 28, 2001 is missing from the application file and requested resubmission. The Examiner is invited to note that the attached Appendix includes the resubmission of the Information Disclosure Statement as filed on June 28, 2001.

Claim Rejections – 35 U.S.C. § 102(e)

The Examiner had rejected claims 1 through 20 under 35 U.S.C. §102(e) as being anticipated by Mukherjee (U.S. Patent 6,314,415, referred to as Mukherjee).

Undersigned has carefully read Mukherjee **(cited by applicant)** and fails to uncover the basis by which Mukherjee discloses each and every element of claims 1 through 14. In addition, undersigned has studied Mukherjee while comparing the requirements of claims 15 through 20 thereto and has failed to uncover the basis by which the Examiner applies Mukherjee to anticipate all of the required steps contained in claims 15 through 20 respectively.

The Court of Appeals for the Federal Circuit has set a very high standard for a finding of anticipation, stating that: ". . . anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference." *Akzo N.V. v. United States ITC*, 808 F.2d 1471, 1 U.S.P.Q.2d 1241 (Fed. Cir. 1986).

Further, "those elements must either be inherent or disclosed expressly . . ." *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 2 U.S.P.Q.2d 1051 (Fed. Cir. 1987). ". . . and must be arranged as in the claim[s] . . ." *Carella v. Starlight Archery & Pro Line Co.*, 804 F.2d 135, 231 U.S.P.Q. 644 (Fed. Cir. 1986).

The above excerpts are from binding, compelling precedent within which the Examiner is constrained to operate for the basis by which rejections under 35 U.S.C. §102 are deemed proper.

With respect to the independent claim 1, rejected under 35 U.S.C. §102(e) as being anticipated by Mukherjee, the Examiner asserts that "Mukherjee anticipates a processor (Mukherjee, col 19, lines 34-35), a memory and a display both operatively coupled to said processor (Mukherjee, col 19, lines 34-37); a plurality of rule steps stored within said memory (Mukherjee, col 19, lines 34-37); means for graphically depicting said plurality of rule steps stored within said memory as an arrangement on said display (Mukherjee, col 19, lines 34-52; col 2. lines 19-38); means for selecting at least one of said graphically depicted rule steps from said arrangement for visually creating a custom rule on said display (Mukherjee, col 2. lines 19-38; Examiner's Note (EN): the form of Mukherjee is a representation of the rules and the specific characteristics of the form represent rule steps)."

In contrast to the Examiner's Note, *Mukherjee defines a form as a standardized document (Column 1, lines 10 through 12) and not as a representation of rules.* Instead, Mukherjee

provides a plurality of prompts each of which is associated with at least one of the logic-based rules in the knowledge base (Column 20, lines 48 through 50) for prompting users for information and generating forms based on predefined rules processing user input information. There is no teaching or suggestion in Mukherjee (or in any of the prior art of record) of creating custom rules from rule steps as original claim 1 particularly points out and distinctly claims.

Thus, in contrast to the Examiner's assertion, Mukherjee clearly does not anticipate (nor render obvious) *graphically depicting rule steps as an arrangement and selecting at least one of said graphically depicted rule steps from said arrangement for visually creating a custom rule on said display* as claim 1 particularly points out and distinctly claims. In stark contrast, Mukherjee provides a plurality of prompts each of which is associated with at least one of the predefined logic-based rules in the knowledge base (Column 20, lines 48 through 50) for prompting users for information and generating forms based on the predefined logic-based rules processing the user input information.

Additionally, applicant recognizes the problems associated with the teachings of the known prior art (including Mukherjee) and directs the reader's attention to these problems in the back ground of the present invention (please see at least page 4, lines 7 through 11) wherein applicant recognizes that "some type of wizard interface may be employed to ask questions and then write code from answers. However, this is still problematic in that text has to be parsed in order for it to be converted into symbols that are then sent to an interpreter or compiler in order to obtain a resultant rule and the user may still have to understand the way previous rules where written."

Notwithstanding the foregoing, undersigned has amended claim 1 hereinabove in order to facilitate a resolution of this case and to further emphasize unique features of the claimed invention of this application which provide further contrasts from prior art teachings. Specifically, claim 1 has been amended hereinabove and now reads as follows: A custom rule system for creating custom rules, said custom rule system comprising in combination: a processor, a memory and a display both operatively coupled to said processor; a plurality of operand and operation rule steps stored within said memory; means for displaying to a user graphical depictions of said plurality of operand and operation rule steps stored within said memory as an arrangement on said display such that said arrangement is comprised of a plurality of individual graphical operand and operation depictions each corresponding to at least one of said operand and operation rule steps; means for a user to select and interconnect at least two of said plurality of individual graphical operand and operation depictions for creating a custom rule comprised of operand and operation rule steps corresponding to the user selection of the at least two of said plurality of individual graphical operand and operation depictions.

Upon a careful reading of the patent to Mukherjee these amended teachings and requirements are clearly neither anticipated (nor rendered obvious) by the disclosure of Mukherjee. In addition, there is no teaching in any of the prior art of record to suggest providing Mukherjee with these teaching and requirements.

Specifically, Mukherjee fails to teach or suggest a plurality of operand and operation rule steps stored within said memory and means for displaying to a user graphical depictions of said plurality of operand and operation rule steps stored within said memory as an arrangement on said display such that said arrangement is comprised of a plurality of individual graphical

operand and operation depictions each corresponding to at least one of said operand and operation rule steps and means for a user to select and interconnect at least two of said plurality of individual graphical operand and operation depictions for creating a custom rule comprised of operand and operation rule steps corresponding to the user selection of the at least two of said plurality of individual graphical operand and operation depictions.

In stark contrast, Mukherjee teaches predefined logic-based rules stored in the knowledge base and a screen displayed to a user having a plurality of prompts each of which is associated with at least one of the predefined logic-based rules in the knowledge base for prompting users for information and generating forms based on the predefined logic-based rules processing user input information. Please see abstract and Column 20, lines 32 through 50.

Hence, the absence from Mukherjee of: 1) *means for displaying operand and operation rule steps as an arrangement comprised of a plurality of individual graphical operand and operation depictions each corresponding to at least one of said operand and operation rule steps* and 2) *means for a user to select and interconnect at least two of said plurality of individual graphical operand and operation depictions for creating a custom rule comprised of operand and operation rule steps corresponding to the user selection of the at least two of said plurality of individual graphical operand and operation depictions* negates anticipation as supported by the Court of Appeals for the Federal Circuit having articulated in binding, compelling precedent that ". . . **[the] absence from the reference of any claimed element negates anticipation**". *Kloster Speedsteel AB v. Crucible Inc.*, 793 F.2d 1565, 230 U.S.P.Q. 81 (Fed. Cir. 1986).

Additionally, and as noted hereinabove, anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference and that those elements must either be inherent or disclosed expressly and **must be arranged as in the claims**.

In light of the above remarks, Mukherjee clearly does not anticipate (nor render obvious) claim 1 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these novel features. Accordingly, amended claim 1 should now warrant patentable status and withdrawal of the rejection of claim 1 under 35 U.S.C. §102(e) is respectfully requested.

Claims 2 and 3 have been amended hereinabove and depend in series from claim 1 and thus, undersigned relies on the arguments made hereinabove with respect to amended claim 1 and on the amendments made to claims 2 and 3 to establish that patentable distinctiveness has been made manifest with respect to claims 2 and 3. Accordingly, withdrawal of the rejection of claims 2 and 3 under 35 U.S.C. §102(e) is respectfully requested.

Claims 12, 14, 19, and 20 have been amended hereinabove to ultimately depend from claim 1 and thus, undersigned relies on the arguments made hereinabove with respect to amended claim 1 and on the amendments made to claims 12, 14, 19, and 20 to establish that patentable distinctiveness has been made manifest with respect to claims 12, 14, 19, and 20. Accordingly, withdrawal of the rejection of claims 12, 14, 19, and 20 under 35 U.S.C. §102(e) is respectfully requested.

With respect to the independent claim 4, the Examiner asserts that "Mukherjee anticipates a database comprised of a multiplicity of rule steps, each said rule step having specific executable code associated therewith (Mukherjee, col 2, lines 19-62); a computer operatively coupled to said

database and including a display for graphically depicting said rule steps in an array and for providing a graphical window (Mukherjee, col 19, lines 34-52); means for interacting with said array to select and place said graphically depicted rule steps from said array to said graphical window for graphical display (Mukherjee, col 19, lines 34-52); means for interconnecting said graphically displayed rule steps within said graphical window for creating a custom rule (Mukherjee, col 19, lines 63-67; EN: linking of the prompts is a manifestation of rule interconnection)."

In stark contrast to the Examiner's assertion, and as noted hereinabove, Mukherjee clearly fails to teach or suggest *a multiplicity of rule steps, each said rule step having specific executable code associated therewith; a computer operatively coupled to said database and including a display for graphically depicting said rule steps in an array and for providing a graphical window; means for interacting with said array to select and place said graphically depicted rule steps from said array to said graphical window for graphical display and; means for interconnecting said graphically displayed rule steps within said graphical window for creating a custom rule* as claim 4 particularly point outs and distinctly claims.

Instead, Mukherjee provides a plurality of prompts each of which is associated with at least one of the predefined logic-based rules in a knowledge base for prompting users for information and generating forms based on the predefined logic-based rules processing user input information. Please see abstract and column 20, lines 48 through 50. There is no teaching or suggestion in Mukherjee (or in any of the prior art of record) of creating custom rules from rule steps as claim 4 particularly point outs and distinctly claims.

Notwithstanding the foregoing, undersigned has amended claim 4 hereinabove in order to facilitate a resolution of this case and to further emphasize unique features of the claimed invention of this application which provide further contrasts from prior art teachings. Specifically, claim 4 has been amended hereinabove and now reads as follows: A custom rule system for creating custom rules, said system comprising in combination: a database comprised of a multiplicity of operand and operation rule steps, each said rule step having specific executable code associated therewith; a computer operatively coupled to said database and including a display for displaying to a user graphical depictions of said multiplicity of operand and operation rule steps stored within said database as an array of a multiplicity of individual graphical operand and operation depictions displayed within a first window on said display and each corresponding to at least one of said multiplicity of operand and operation rule steps; means for displaying a rules window on said display; means for a user to interface with said array displayed in said first window to select and place a plurality of said multiplicity of individual graphical operand and operation depictions from said array to said rules window for graphical display; and means for interconnecting said plurality of said multiplicity of individual graphical operand and operation depictions displayed in said rules window for creating a custom rule.

Upon a careful reading of the patent to Mukherjee these amended teachings and requirements are clearly neither anticipated (nor rendered obvious) by the disclosure of Mukherjee. In addition, there is no teaching in any of the prior art of record to suggest providing Mukherjee with these teaching and requirements.

Specifically, Mukherjee fails to teach or suggest at least the following claimed elements:

1) a computer operatively coupled to said database and including a display for <u>displaying</u>

<u>to a user graphical depictions of said multiplicity of operand and operation rule steps stored</u>

<u>within said database as an array of a multiplicity of individual graphical operand and operation</u>

<u>depictions displayed within a first window on said display and each corresponding to at least one</u>

<u>of said multiplicity of operand and operation rule steps</u>;

2) <u>means for displaying a rules window on said display</u>;

3) means for <u>a user to interface</u> with said array <u>displayed in said first window</u> to select

and place <u>a plurality of said multiplicity of individual graphical operand and operation depictions</u>

from said array to said <u>rules</u> window for graphical display; <u>and</u>

4) means for interconnecting said <u>plurality of said multiplicity of individual graphical</u>

<u>operand and operation depictions displayed in said rules window</u> for creating a custom rule.

In stark contrast, Mukherjee teaches predefined logic-based rules stored in the knowledge

base and a screen displayed to a user having a plurality of prompts each of which is associated

with at least one of the predefined logic-based rules in the knowledge base for prompting users

for information and generating forms based on the predefined logic-based rules processing user

input information. Please see abstract and Column 20, lines 32 through 50.

Hence, the absence from Mukherjee of all four of the above claimed elements clearly

negates anticipation and even an absence on any one of the above four claimed elements negates

anticipation as supported by the Court of Appeals for the Federal Circuit having articulated in

binding, compelling precedent that ". . . **[the] absence from the reference of any claimed**

element negates anticipation". *Kloster Speedsteel AB v. Crucible Inc.,* 793 F.2d 1565, 230

U.S.P.Q. 81 (Fed. Cir. 1986).

Additionally, and as noted hereinabove, anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference and that those elements must either be inherent or disclosed expressly and **must be arranged as in the claims**.

In light of the above remarks, Mukherjee clearly does not anticipate (nor render obvious) claim 4 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these features. Accordingly, amended claim 4 should now warrant patentable status and withdrawal of the rejection of claim 4 under 35 U.S.C. §102(e) is respectfully requested.

Claims 5 through 8 depend in series from independent claim 4 and thus, undersigned relies on the arguments made hereinabove with respect to amended claim 4 to establish that patentable distinctiveness has been made manifest with respect to claims 5 through 8. Accordingly, withdrawal of the rejection of claims 5 through 8 under 35 U.S.C. §102(e) is respectfully requested.

Additionally, claims 10 and 11 have both been amended hereinabove to depend from independent claim 4 and thus, undersigned relies on the arguments made hereinabove with respect to amended claim 4 to establish that patentable distinctiveness has been made manifest with respect to claims 10 and 11. Accordingly, withdrawal of the rejection of claims 10 and 11 under 35 U.S.C. §102(e) is respectfully requested.

With respect to the independent claim 9, the Examiner asserts that "Mukherjee anticipates an arrangement of graphically depicted rule steps, each said graphically depicted rule step having assembled code associated therewith and stored within a database (Mukherjee, col 19, lines 34-52); means for individually selecting said graphically depicted rules steps from said arrangement

and disposing said selected rules in a graphical window such that said selected rules are arranged in a substantially columnar format (Mukherjee. col 2, lines 19-38; Fig. 3A); means for graphically interconnecting said selected rule steps disposed in said graphical window (Mukherjee, col 2, lines 39-62; col 19, lines 62-67), and means for storing said graphically interconnected selected rule steps disposed in said graphical window as a custom rule to be employed for decision making in an expert system (Mukherjee, col 2, lines 39-62; col 19, lines 62-67)."

In stark contrast to the Examiner's assertion, Mukherjee at column 19, lines 34-52 teaches "displaying on a computer device a form" which is defined at column 2 line 10 as a document and further teaches that the form comprises "a first plurality of prompts" and "receiving a response corresponding to one of the first plurality of prompts" and "converting the response into a factual insertion in a rule based driven knowledge base comprising rules written in a declarative language" and "executing the rules . . . to test for a condition, and in response to the condition being satisfied changing the appearance of the form to display a new prompt . . ."

Thus, Mukherjee clearly fails to teach or suggest *an arrangement of graphically depicted rule steps, each said graphically depicted rule step having assembled code associated therewith and stored within a database; means for individually selecting said graphically depicted rules steps from said arrangement and disposing said selected rules in a graphical window such that said selected rules are arranged in a substantially columnar format; means for graphically interconnecting said selected rule steps disposed in said graphical window, and means for storing said graphically interconnected selected rule steps disposed in said graphical window as*

a custom rule to be employed for decision making in an expert system as claim 9 particularly

point outs and distinctly claims.

Instead, Mukherjee provides displaying on a computer device a form defined as a

document and a first plurality of prompts and means for receiving a response corresponding to

one of the first plurality of prompts and converting the response into a factual insertion in a rule

based driven knowledge base comprising rules written in a declarative language and executing

the rules to test for a condition, and in response to the condition being satisfied changing the

appearance of the form to display a new prompt. Further, Mukherjee teaches that the plurality of

prompts are each associated with at least one of the predefined logic-based rules in a knowledge

base for prompting users for information and generating forms based on the predefined logic-

based rules processing user input information. Please see column 19, lines 34 through 52,

column 2 line 10, and the abstract. Hence, there is clearly no teaching or suggestion in

Mukherjee (or in any of the prior art of record) of creating custom rules from rule steps as claim

9 particularly point outs and distinctly claims.

Notwithstanding the foregoing, undersigned has amended claim 9 hereinabove in order to

facilitate a resolution of this case and to further emphasize unique features of the claimed

invention of this application which provide further contrasts from prior art teachings.

Specifically, claim 9 has been amended hereinabove and now reads as follows: A custom rule

system for creating custom rules, said system comprising in combination: <u>a database comprised</u>

<u>of a multiplicity of operand and operation rule steps, each said rule step having specific</u>

<u>executable code associated therewith; a computer operatively coupled to said database and</u>

<u>including a display for displaying to a user graphical depictions of said multiplicity of operand</u>

and operation rule steps stored within said database as an arrangement of a multiplicity of individual graphical operand and operation depictions displayed in a first window on said display and each corresponding to at least one of said multiplicity of operand and operation rule steps; means for displaying a rules window on said display; means for individually selecting, dragging, and dropping a plurality of said multiplicity of individual graphical operand and operation depictions from said first window to said rules window; means for graphically interconnecting said individual graphical operand and operation depictions in said rules window, and means for storing said graphically interconnected selected individual graphical operand and operation depictions in said rules window as a custom rule to be employed for decision making in an expert system.

Upon a careful reading of the patent to Mukherjee these amended teachings and requirements are clearly neither anticipated (nor rendered obvious) by the disclosure of Mukherjee. In addition, there is no teaching in any of the prior art of record to suggest providing Mukherjee with these teaching and requirements.

Specifically, Mukherjee fails to teach or suggest at least the following claimed elements:

1) a display for displaying to a user graphical depictions of said multiplicity of operand and operation rule steps stored within said database as an arrangement of a multiplicity of individual graphical operand and operation depictions displayed in a first window on said display and each corresponding to at least one of said multiplicity of operand and operation rule steps; means for displaying a rules window on said display;

2) means for individually <u>selecting, dragging, and dropping a plurality of said multiplicity</u> <u>of individual graphical operand and operation depictions from said first window to said rules</u> <u>window;</u>

3) means for graphically interconnecting said <u>individual graphical operand and operation</u> <u>depictions</u> in said <u>rules</u> window, and means for storing said graphically interconnected selected <u>individual graphical operand and operation depictions</u> in said <u>rules</u> window as a custom rule to be employed for decision making in an expert system.

In stark contrast, Mukherjee teaches predefined logic-based rules stored in the knowledge base and a screen displayed to a user having a plurality of prompts each of which is associated with at least one of the predefined logic-based rules in the knowledge base for prompting users for information and generating forms based on the predefined logic-based rules processing user input information. Please see abstract and Column 20, lines 32 through 50.

Hence, the absence from Mukherjee of all of the above claimed elements clearly negates anticipation and even an absence on any one of the above claimed elements negates anticipation as supported by the Court of Appeals for the Federal Circuit having articulated in binding, compelling precedent that ". . . [the] **absence from the reference of any claimed element** **negates anticipation"**. *Kloster Speedsteel AB v. Crucible Inc.,* 793 F.2d 1565, 230 U.S.P.Q. 81 (Fed. Cir. 1986).

Additionally, and as noted hereinabove, anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference and that those elements must either be inherent or disclosed expressly and **must be arranged as in the claims**.

In light of the above remarks, Mukherjee clearly does not anticipate (nor render obvious) claim 9 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these features. Accordingly, amended claim 9 should now warrant patentable status and withdrawal of the rejection of claim 9 under 35 U.S.C. §102(e) is respectfully requested.

The Examiner had also rejected claim 15 under 35 U.S.C. §102(e) as also being anticipated by Mukherjee. In light of the above remarks, Mukherjee clearly does not anticipate (nor render obvious) claim 15 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these claimed features.

Specifically, and referring to column 2, Mukherjee includes "a rule-based expert system and method that uses high-level rules **for determining what graphical interface features should be displayed to a user**" and "Consequently, people other than programmers can **customize and change a graphical user interface** easily and without errors." Please see column 2, lines 25 through 35. Additionally, Mukherjee teaches that "Certain embodiments of the present invention include a scanner and related software that captures data fields from existing paper forms; **a database for storing** field definitions and their relationships together with **rules for determining which user interface features to display at a particular point in a data entry sequence**; an inference engine for **executing the rules**; a graphical user interface component that **provides the user with dynamically generated screen configurations based on execution of the rules** (which are fired based on inferences drawn from data the user has entered); and a printing component that **generates** paper and/or electronic **forms based on the user's inputs and the execution of the rules**. Please see column 2, lines 39 through 51.

[Amendment - Docket No. 2057-pa -Page 24 of 28]

Thus, Mukherjee teaches "a database for storing rules for determining which user interface features to display at a particular point in a data entry sequence" **not** *storing individual rule steps comprised of executable code within a database coupled to a computer* as claim 15 particularly points out and distinctly claims. Additionally, Mukherjee teaches an "inference engine for **executing the rules** and a graphical user interface component that **provides the user with dynamically generated screen configurations based on execution of the rules** (which are fired based on inferences drawn from data the user has entered)" **not** *depicting said rules steps on a display of said computer as a graphical arrangement of icons* as claim 15 particularly points out and distinctly claims. Furthermore, Mukherjee teaches "a printing component that generates paper and/or electronic forms based on the user's inputs and the execution of the rules" **not** *creating a custom rule by interfacing with said graphical arrangement of icons* as claim 15 particularly points out and distinctly claims.

The Court of Appeals for the Federal Circuit has set a very high standard for a finding of anticipation, stating that: ". . . anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference." *Akzo N.V. v. United States ITC*, 808 F.2d 1471, 1 U.S.P.Q.2d 1241 (Fed. Cir. 1986). And further, "those elements must either be inherent or disclosed expressly . . ." *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 2 U.S.P.Q.2d 1051 (Fed. Cir. 1987). ". . . and must be arranged as in the claim[s] . . ." *Carella v. Starlight Archery & Pro Line Co.*, 804 F.2d 135, 231 U.S.P.Q. 644 (Fed. Cir. 1986).

Notwithstanding the foregoing, undersigned has amended claim 15 hereinabove in order to facilitate a resolution of this case and to further emphasize unique features of the claimed invention of this application which provide further contrasts from prior art teachings.

Specifically, claim 15 has been amended hereinabove and now reads as follows: A method for creating custom rules, the steps including: storing individual <u>operand and operation</u> rule steps comprised of executable code within a database coupled to a computer; depicting said <u>operand and operation</u> rules steps on a display of said computer as a graphical arrangement of <u>operand and operation</u> icons; creating a <u>user defined</u> custom rule by interfacing with said graphical arrangement of <u>operand and operation</u> icons <u>for selecting and placing a plurality of said operand and operation</u> icons <u>from said graphical arrangement to a graphical window on said display and interconnecting said icons placed within said graphical window.</u>

Hence, Mukherjee clearly does not anticipate (nor render obvious) claim 15 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these novel features. Accordingly, amended claim 15 should now warrant patentable status and withdrawal of the rejection of claim 15 under 35 U.S.C. §102(e) is respectfully requested.

The Examiner had also rejected claim 18 under 35 U.S.C. §102(e) as also being anticipated by Mukherjee. In light of the above remarks, Mukherjee clearly does not anticipate (nor render obvious) claim 18 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these claimed features.

Specifically, claim 18 has been amended hereinabove and now reads as follows: A method for creating custom rules, the steps including: selecting an asset for a custom rule; defining input value steps to be used in the custom rule; each said input value step including at least one output; depicting said input value steps in a graphical window of a graphical user interface of a computer; depicting a matrix of graphically depicted <u>operand and operation</u> rule

steps on said graphical user interface, each said graphically depicted <u>operand and operation</u> rule step having assembled rule step code associated therewith and stored within a database coupled to said computer; selecting <u>by a user an operand</u> a result step from said matrix of graphically depicted <u>operand and operation</u> rule steps and placing said <u>operand</u> result step into said graphical window, said <u>operand</u> step including at least one input; defining a result that will be created when an input to said selected <u>operand</u> step is true; selecting <u>by a user</u> at least one operation step from said matrix of graphically depicted rule steps and placing said at least one operation step into said graphical window at a location interposed between said input value steps and said <u>operand</u> step, said at least one operation step having at least one input and at least one output; connecting <u>by a user</u> said at least one output of each of said input value steps to said at least one input of said operation step, and connecting <u>by a user</u> said at least one output of said operation step to said at least one input of said result step for creating a custom rule.

In stark contrast to claim 18, Mukherjee teaches **"the use of rules for determining what graphical interface features should be displayed to a user."** Please see column 2, lines 25 through 35. Additionally, Mukherjee teaches that "a scanner and related software that captures data fields from existing paper forms; **a database for storing** field definitions and their relationships together with **rules for determining which user interface features to display at a particular point in a data entry sequence**; an inference engine for **executing the rules**; a graphical user interface component that **provides the user with dynamically generated screen configurations based on execution of the rules** (which are fired based on inferences drawn from data the user has entered); and **a printing component that generates paper and/or**

electronic forms based on the user's inputs and the execution of the rules. Please see column 2, lines 25 through 51.
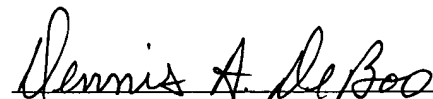
Hence, Mukherjee clearly does not anticipate (nor render obvious) claim 18 particularly as now amended, and there is no teaching in any of the prior art of record to suggest providing Mukherjee with these novel features. Accordingly, amended claim 18 should now warrant patentable status and withdrawal of the rejection of claim 18 under 35 U.S.C. §102(e) is respectfully requested.

Conclusion

It is undersigned sincere belief that all issues raised by the Examiner in the last Office Action have been satisfactorily addressed herein. Therefore, in view of the foregoing, it is respectfully requested that the Examiner pass this case to issue. If, upon further consideration, the Examiner believes further issues remain outstanding or new ones have been generated, undersigned respectfully requests that the Examiner call undersigned and suggest a convenient time when an **interview** may be conducted to expeditiously resolve same.

Dated: October 17, 2003

Respectfully Submitted:

Dennis A. DeBoo
Telephone (916) 449-3983
Registration No.: 42,471

Attachement